

Berger, Fischoff, Shumer,  
Wexler & Goodman, LLP  
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Syosset, New York 11791  
Heath S. Berger, Esq.  
Gary C. Fischoff, Esq.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: Chapter 11

RUDOLPH W. GIULIANI Case No: 23-12055  
a/k/a RUDOLPH WILLIAM GIULIANI

Debtor

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**NOTICE OF HEARING ON THE DEBTOR'S MOTION FOR AN ORDER MODIFYING  
THE AUTOMATIC STAY FOR THE LIMITED PURPOSE OF ALLOWING THE  
DEBTOR TO PROCEED WITH PROSECUTING AND PERFECTING THE FREEMAN  
APPEAL BEFORE THE D.C. CIRCUIT**

**PLEASE TAKE NOTICE** that on upon the annexed motion (the "Motion") of Rudolph W. Giuliani, the debtor and debtor-in-possession herein ("Debtor"), by his attorneys, Berger, Fischoff, Shumer, Wexler & Goodman, LLP dated April 26, 2024 for an order modifying the automatic stay for the limited purpose of allowing the Debtor to proceed with prosecuting and perfecting the *Freeman* appeal before the D.C. Circuit pursuant to Section 362(d) of the Bankruptcy Code, and for such other and further relief as may be just and proper, there will be a hearing before the Honorable Sean H. Lane, United States Bankruptcy Judge, Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 on **May 14, 2024 at 11:00 a.m.**, or as soon thereafter as counsel can be hearing (the "Hearing Date");

**PLEASE TAKE FURTHER NOTICE**, that all hearing participants must register with eCourt Appearances two days in advance of all appearances. Registration is required by both attorneys and non-attorneys. If you have a CM/ECF account, you may access eCourt Appearances in the "Utilities" menu after logging into CM/ECF. If you do not have a CM/ECF account, you

may access eCourt Appearances on the Court's website at: <https://ecf.nysb.uscourts.gov/cgi-bin/nyebAppearances.pl>.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the relief requested to the Motion, if any, are required to be served on or before May 7, 2024.

Dated: Syosset, New York  
April 26, 2024

BERGER, FISCHOFF, SHUMER,  
WEXLER & GOODMAN, LLP  
*Attorneys for the Debtor*

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